

# FAGEL & HABER

ATTORNEYS AND COUNSELORS AT LAW

ESTABLISHED 1962

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**BY CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

November 29, 1994

Ms. Marsha A. Adams, 5HSM-5J  
United States Environmental  
Protection Agency  
Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

**RECEIVED**

DEC 02 1994

**SUPERFUND PROGRAM  
MANAGEMENT BRANCH**

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OF COUNSEL  
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WATER'S DIRECT DIAL NO.

(312) 580-2244

**RE: Response to Request for Information Pursuant to Section 104(a)**  
**of CERCLA**  
**Sauget Area 1, Sauget, Illinois**  
**Rogers Cartage Company**  
**Our File No.: 26947-020**

Dear Ms. Adams:

Enclosed please find our client's response to Mr. Mateer's undated request and your supplement of October 26, 1994 to that request. The supplement, received October 31, 1994, was necessary in preparation of the response.

Thank you for your cooperation in this matter.

Very truly yours,

  
Thomas B. Golz

Enclosures

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E/L

**RESPONSE TO REQUEST FOR INFORMATION PURSUANT TO  
SECTION 104(e) OF CERCLA FOR SAUGET AREA 1, SAUGET, ILLINOIS  
RECEIVED OCTOBER 7, 1994 AND REVISED OCTOBER 26, 1994**

1. Paul Hinds, Vice President, Rogers Cartage Company.  
Allyn Konrad, Terminal Manager, Rogers Cartage Company,  
Sauget, Illinois
2. 1990 responses to Illinois Environmental Protection Agency  
inquiries regarding Sauget Areas 1 and 2, copy enclosed as  
exhibit A.
3. None.
4. ILD006932438, Rogers Cartage Company, Sauget, Illinois.
5. Rogers Cartage Company conducted no hazardous waste or  
hazardous materials activities at the Site.
6. No information. See 5 above.
7. Rogers Cartage Company is a common carrier, delivering liquid  
product cargoes from shipper to end user. Rogers Cartage  
Company's Falling Springs/Avenue/Nickel Street, Sauget,  
Illinois establishment is a tank truck terminal established on  
or about 1970. Before 1970, Rogers did not have a terminal in  
Sauget. Tanker trailers returning to the terminal after  
deliveries are RCRA empty, with all residues removeable by  
normal means drained at the consignee facility. Tanker  
trailers are water and detergent solution rinsed, with the  
rinsate discharged to the POTW.  
The only circumstance where a cargo would be transported to  
the Rogers' facility for a brief period would be to change  
cab, change driver, or coordinate delivery to the consignee.
8. No information.
9. No information.
10. See Exhibit A for listing of common cargo chemicals. No on  
site disposal was or is conducted, and tank cleaning is and  
was conducted by Rogers personnel. See 7 above.
11. No wastes accepted at Rogers' facility.
12. See 11 above.
13. a) No.  
b) No.  
c) No.

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14. No. This property had been acquired for the construction of a new terminal, but the new terminal was never built at that site, and Rogers conducted no activity at sites H and I.
15. No information.
16. No.
17. See 7 above.
18. Rogers Cartage Company is a common carrier, delivering liquid chemical products cargoes on behalf of various shippers to their consignees. While Rogers Cartage Company has made cargo deliveries to Sauget/Cahokia area facilities, in the absence of street address information or name information for the designated sites within Area 1, we can not determine whether any of the consignee locations are within the area designated as Sauget Area 1 Site.

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**AFFIDAVIT**

**STATE OF ILLINOIS**

**COUNTY OF COOK**

**Paul Hinds on oath deposes and says that:**


1. I am the Vice President Rogers Cartage Company. I have been employed by Rogers Cartage Company since 1950, and have been employed in an executive capacity by Rogers Cartage Company since 1955.

2. I have reviewed U.S. EPA's Request for Information Pursuant to Section 104(e) of CERCLA for Sauget Area 1, Sauget, Illinois (the "Site"). I have reviewed available records and consulted other Rogers personnel seeking relevant information regarding the Information Request, and provide the attached response based upon my review.

**FURTHER AFFIANT SAYETH NOT.**

  
Paul Hinds, Vice President  
Rogers Cartage Company

Subscribed to and sworn before me this 18<sup>th</sup> day of November, 1994.

  
Notary Public



007984

February 27, 1990

Mr. William C. Child, Manager  
Illinois Environmental Protection  
Agency  
Division of Land Pollution Control  
2200 Churchill Road  
P. O. Box 19276  
Springfield, IL 62794-9276

Re: L1630200005 St. Clair County  
Sauget Sites Area II

Dear Mr. Child:

This letter is in response to your letter requesting information on our involvement with the above-mentioned site.

1. N/A
2. Our preliminary investigation has determined that our only involvement with this site has to do with our wastewater discharge to the Sauget Water Treatment Plant. This wastewater was generated from the internal cleaning of our tank trucks. To the best of my knowledge the following is a list of chemicals listed in Section 1004(6) of R.C.R.A. that have been cleaned at this site.

Chlorobenzene, Chlorosulfonic Acid, Di Chlorobenzene, Dodecylbenzenesulfonic Acid, Hydrochloric Acid, Maleic Anhydride, Napthalene, Phosphoric Acid, Phosphorus Oxychloride, Phosphorus Trichloride, Sodium Hydroxide, Styrene Sulfuric Acid, Xylene, Zinc Chloride and Zinc Sulfate.

3. We are unable to determine this.
4. N/A
5. N/A
6. All the analyses of our wastewater that I have are attached.
7. We are insured by the Travelers Companies. Attached is our Certificate of Insurance.
8. There is no formal agreement between Rogers and the Sauget P.O.T.W.

**ROGERS**



**CARTAGE CO.**

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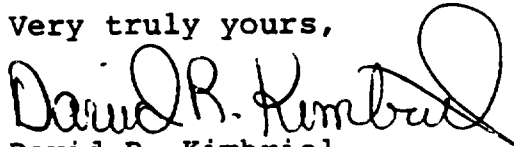
February 27, 1990

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Mr. William C. Child, Manager  
Illinois Environmental Protection  
Agency  
Springfield, IL 62794-9276

I certify that all information contained herein true and accurate to the best of my knowledge and belief.

Very truly yours,



David R. Kimbriel  
Environmental Mgr.

:frg

Encs.

bcc: Mr. Tom Golz  
Fagel, Haber & Maragos

**ROGERS**



**CARTAGE CO.**

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